

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

NATALIE OKTEN, on behalf of herself  
and those similarly situated,

Plaintiff,

v.

RADIUS GLOBAL SOLUTIONS, LLC;  
and JOHN DOES 1 TO 10.,

Defendant.

Case No. 22-cv-782

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446, Defendant, Radius Global Solutions, LLC (“RGS”), through undersigned counsel, hereby removes the above-captioned civil action from the Essex County Superior Court of the State of New Jersey to the United States District Court for the District of New Jersey. The removal of this civil case is proper because:

1. On or about January 13, 2022, Plaintiff, Natalie Okten (“Plaintiff”), commenced a civil action in the Essex County Superior Court of the State of New Jersey, entitled and captioned as *Natalie Okten, on behalf of herself and those similarly situated v. Radius Global Solutions, LLC and John Does 1-10*, Case No. ESX-L-102-22 (hereinafter the “State Court Action”). No further proceedings before the State Court have occurred.

2. In the Complaint, Plaintiff alleges statutory causes of action against RGS under the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.* A true and correct copy of plaintiff’s Complaint, together with all process, pleadings and orders

served on RGS, is attached hereto as **Exhibit A**. Therefore, this Court has jurisdiction over the State Court Action pursuant to 28 U.S.C. § 1331 because plaintiff's Complaint alleges a cause of action arising under the laws of the United States. Because plaintiff affirmatively alleges violations of federal law, the Complaint asserts a federal question under 28 U.S.C. § 1331 and is removable pursuant to 28 U.S.C. § 1441.

3. RGS received a copy of the Summons and Complaint on January 14, 2022.

4. The time within which RGS is required by the laws of the United States, 28 U.S.C. § 1446(b), to file this notice of removal has not yet expired. This Notice of Removal is timely, having been filed within 30 days of the date on which RGS received a copy of the Summons and Complaint. *See* 28 U.S.C. § 1446.

5. The Essex County Superior Court of the State of New Jersey is located within the United States District Court for the District of New Jersey. Therefore, venue for purposes of removal is proper because the United States District Court for the District of New Jersey embraces the place in which the removed action was pending. 28 U.S.C. § 1441(a).

6. Written notice of this Notice of Removal of this action is being immediately provided to the Essex County Superior Court of the State of New Jersey. *See* **Exhibit B** attached hereto.

7. Written notice of this Notice of Removal of this action is being caused to be served on all counsel and parties of record, including plaintiff through his counsel.

WHEREFORE, defendant, Radius Global Solutions, LLC, hereby removes to this Court the State Court Action.

Dated: February 14, 2022

Respectfully Submitted,

/s/ Aaron R. Easley

Aaron R. Easley, Esq.

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*Counsel for Defendant,*

*Radius Global Solutions, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 14, 2022, a copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including plaintiff's counsel, as described below:

Yongmoon Kim, Esq.  
Kim Law Firm LLC  
411 Hackensack Avenue 2nd Floor  
Hackensack, NJ 07601

/s/ Aaron R. Easley

Attorney